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FIRE DEPARTMENT

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D. M. CHAMBERLIN, SR.
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April 22, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M. Street Northwest
Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: PR Docket No. 92-235

Dear Ms. Searcy:

Having over 20 years experience in Public Safety, I feel obligated to comment on the spectrum "refarming" proposal contained in the above mentioned docket. I expect this proposal would have a devastating effect on the budgets, as well as the communications systems, of 80% of the public safety agencies across the country, as it is now written.

The proposal, as presented, offers no migration path for agencies to switch to the new technology. Old equipment will not be compatible with the new technology, so there can be no "transition period", which would allow agencies to phase in the necessary new equipment.

This means budgets must absorb the cost of completely replacing radio systems, instead of converting over several years. With government budgets as they stand today, this may literally be an impossibility in many jurisdictions.

There is also the problem of neighboring agencies who now enjoy inter-agency communications because of their compatible systems. New systems and old systems would be incompatible. If we choose to convert and our neighboring Fire Department don't, all of our inter-agency communications capability will be lost.

While I can agree that measures must be taken to address spectrum overcrowding, these measures must not result in a decrease in capability and efficiency of public safety radio communications as they now exist. The impact of any actions taken must consider the ability of the users to conform with the new requirements, as well as the results of this conformity.

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April 22, 1993

RE: PR Docket No. 92-235

Page 2

Public Safety Communications can not simply stop and make a major change in direction without compromising the protective services provided to the public. To reduce or restrict these agencies ability to communicate will indeed compromise the safety of the public and this is not an area in which we can compromise.

Any changes to be made in the overall system must be absorbed by the system without disrupting its operation. This is where the current proposal fails dramatically and will have devastating effects. A means to accomplish the advances that this new technology offers, while allowing it to be properly phased in must be developed. Only then will this change be deemed to be acceptable.

Respectfully,



Allen C. Bryant, Jr.
Head of Communications

ACB:vsr